



**PSA 3
PASSAGES
Area 3 Agency on Aging
MONITORING REPORT
January 11-14, 2010**



California Department of Aging (CDA) Staff

An onsite assessment of the Area 3 Agency on Aging was conducted by CDA staff from January 11-14, 2010. The following CDA Staff were present:

Sue Lyle	Coach	Long Term Care and Aging Services Division-Team B
Donna DiMinico	Aging Programs Specialist	Administrative Services
Mame Polito	Data Program Specialist	Data Team
Lilit Tovmasian		
Vern Foster	Fiscal Program Specialist	Fiscal Program Services
Joel Weeden	FCSP Specialist	Title III E Family Caregiver Support Program
Barbara Estrada, R.D.	Public Health Nutritionist	Title III C Elderly Nutrition Program and Title III D Disease Prevention and Health Promotion
Denny Wight	Aging Programs Specialist	Title III B Supportive Services, Information and Assistance and Disaster Preparedness
Steve Miars	HICAP Program Specialist	Health Insurance Counseling and Advocacy Program (HICAP)

Monitoring Report

Throughout the monitoring report, Passages and Area 3 Agency on Aging (A3AA) is used interchangeably and, in every instance, the two terms are synonymous. CDA staff monitored administrative, fiscal, and specific program standards required by the Older Americans Act (OAA), Older Californians Act (OCA), and American Recovery and Reinvestment Act (ARRA). This report includes:

- Recap of the standards monitored during the visit;
- Recognition of any identified best practices or models of service delivery that will be shared with the aging network by a notice posted on CDA's website;
- Findings and required actions to be taken by the Passages to correct specific findings associated with the monitoring visit; and
- Corrective Action Plan to be completed by Passages and submitted to CDA.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap/overview of the standards reviewed during the monitoring visit and the recognition of the A3AA staff that assisted CDA to accomplish its work.

AAA Administrative Governing Board

Sue Lyle and Donna DiMinico met with Gayle Hutchinson, Dean of the College of Behavioral and Social Sciences and Carol Sager, Director of the Office of Research and Sponsored Programs, to determine if the Governing Board understands its role in development and coordination of community-based system of care, for older individuals living within the Planning and Service Area (PSA).

The Passages Policy Board is made up of four members appointed by the California State University, Chico (CSUC) Research Foundation. The Policy Board has a reputable working relationship between the Advisory Council and A3AA Executive Director. The A3AA Executive Director regularly communicates with the Policy Board, disseminating community concerns. The Policy Board and Advisory Council meet annually and occasionally participate in public hearings and Advisory Council meetings.

Advisory Council

Sue Lyle and Donna DiMinico met with Shirley Boracci, Advisory Council Chair, to determine if the Advisory Council is a visible leader in advocating the needs and concerns of seniors living within the A3AA community.

The Advisory Council is comprised of 19 active members representing five surrounding counties. Council meetings are rotated between communities and are open to the public. The Advisory Council has the opportunity to advise the A3AA on all matters related to the development and administration of the Area Plan.

Staffing and Organization

Donna DiMinico met with Joe Cobery, Director, and Mary Neumann, Deputy Director, to determine if the AAA has an adequate number of trained staff to administer programs to older individuals living within the PSA. Ms. DiMinico reviewed duty statements and the CSUC Research Foundation Personnel handbook updated in March 2007. Each Program maintains and updates its own desk manual. The A3AA provides training to all A3AA staff on a quarterly basis and Programs conduct training at Program meetings. It was determined that personnel practices and procedures are established and maintained.

Procurement/Contract Process

Donna DiMinico met with Joe Cobery, Director, and Mary Neumann, Deputy Director, to determine if the A3AA have established systematic procedures for the procurement, award and administration of contracts through an open and competitive process. Ms. DiMinico reviewed documentation provided by Ms. Neumann and Joleen Barnhill, A3AA Financial Officer. CSUC Research Foundation Policy Board oversees the Request for

Proposal (RFP) or Request for Invitation (RFI) and Contract processes. The A3AA's Advisory Council participates in the evaluation of proposals. There were no appeals or grievances filed because of the RFP or award process. Ms. DiMinico determined provider contracts contain all required components.

Management of Service Providers

Donna DiMinico met with Joe Cobery, Director, and Mary Neumann, Deputy Director, to determine if the A3AA effectively communicates with, disseminates policies to, and monitors its service providers. Joleen Barnhill, A3AA Financial Officer, and Nancy Taylor, Aging Program Specialist, provided additional clarification and documentation upon request.

Ms. DiMinico reviewed the A3AA's contractor monitoring tool, current monitoring schedule and contracted service provider files. The A3AA provides orientation to all new providers. Meetings with Nutrition providers are held twice a year and meetings with other contractors are held at the annual onsite monitoring. The A3AA monitors its contracted service providers' service activity levels on a monthly basis to ensure compliance. If necessary, the A3AA provides technical assistance and corrective actions plans.

AAA Data

During the monitoring visit, Donna DiMinico met with Joe Cobery, AAA Director, and Mary Neumann, AAA Deputy Director, to conduct a preliminary review of the AAA's data reporting processes and procedures to ensure that the performance data collected/reported is timely and complete, and that necessary training is provided by the AAA to its sub-contractors. The AAA data reported to CDA should ensure procedures and practices are in place to determine AAA and subcontractor data is verified for accuracy and has met the California Aging Reporting System (CARS) specifications and National Aging Program Information System (NAPIS) requirements.

AAA Fiscal

Vern Foster and Sue Lyle met with Joleen Barnhill, A3AA Financial Officer, to review the fiscal systems of the AAA. Financial standards and areas reviewed include Contracts, Accounting Records, Budget Control, Cash Management, Financial Reporting, Allowable Costs, AAA Budget Process, Internal Controls, and Fiscal Monitoring. Ms. Barnhill, working under the structure of CSUC Research Foundation, uses IFAS Net software for tracking revenue and expenditures for direct service and administrative staff salaries, benefits and other direct service costs. Excel spreadsheets are utilized for tracking provider contract expenditures and for compiling summary grant expenditures and revenue funding sources for each grant. Given the complexity of the agency's structure and fiscal systems they maintain an efficient fiscal process.

Specific Programs—Older Americans Act

Title III B Supportive Services (General)

Denny Wight met with Mary Neumann, Deputy Director, to review the CDA Title III B Monitoring Tool. The major areas discussed included the development of community-

based services, program operations, and administrative programmatic procedures. The A3AA maintains proper documentation for its Title III B operations.

The A3AA contracts with the Colusa County Transit program for Title III B Transportation services. Mr. Wight met with Barbara Salazar, Program Director, to discuss the operation of the program, review samples of files and back-up documentation for service units being reported to the A3AA.

Title III B Information and Assistance (I&A)

Denny Wight met with Mary Neumann, Deputy Director, to discuss I&A service delivery and review the I&A Program Assessment Tool. The interview included an evaluation of I&A practices conducted by the A3AA. The A3AA provides I&A services directly and indirectly through four satellite sites in Plumas, Colusa, Glenn, and Tehama counties.

The AAA has a very comprehensive resource directory titled, "Passages Resource Guide" that is utilized by I&A staff and is distributed to the public. A database is maintained to include information collected from the I&A intake form.

Mr. Wight also observed an I&A staff worker responding to a telephone inquiry. The staff person was very cordial, ascertained the client's needs, answered questions, and provided referral to needed services.

Disaster Preparedness

Denny Wight met with Joe Cobery, Director to review the Emergency and Disaster Preparedness Monitoring Tool. The A3AA Disaster Preparedness manual is designed to address the needs of older adults and family caregivers during emergencies and disasters. It contains steps for individual units in the A3AA to follow when preparing and responding to disasters. A3AA staff actively participates in, and collaborations with local and regional disaster planning efforts. Training is provided to A3AA staff on an annual basis.

Title III C—Elderly Nutrition Program (ENP)

Barbara Estrada, R.D. met with Joe Cobery, Executive Director, Mary Neumann, Deputy Director, and Nancy Taylor, Aging Programs Specialist to review the ENP monitoring tool. This included an assessed the donation procedures, congregate meal service at three meal sites as well as three production kitchens, current ENP menu compliance with Dietary Reference Intakes (DRI), Home-Delivered Meals (HDM) policies and procedures, annual monitoring reports, corrective action plans, eligibility assessments, contracts, quarterly staff training, training evaluations, and nutrition education topics.

Ms. Estrada, Ms. Neumann, and Ms. Taylor met with Nell Bernstein, Senior Nutrition Program Coordinator to conduct a review of the ENP production kitchen at the Colusa County Senior Nutrition Program. This small program receives about 47 hot home-delivered meals (HDM) per day and from 6 to 12 congregate meals from the Colusa Hospital Cafeteria kitchen. Based on need, the HDM clients may receive frozen meals

for the weekend. The visit included a review of the HDM participants' quarterly eligibility assessments, and the pack out procedure for HDM.

A review of the Colusa County Boy Scout Cabin congregate meal site included a review of the congregate meal service procedures, donation procedures, and participants' interviews.

Ms. Estrada met with Martha Heezel, Division Director and Marleen Langrehr, Senior Nutrition Program Coordinator, to perform an evaluation of the Quincy Senior Center in Plumas County. The visit included a review of the home-delivered meal participants' quarterly eligibility assessments, congregate meal service procedures, donation procedures, HDM pack out and participants' interviews. The senior nutrition program in this remote area is an important part of the community, providing the opportunity for many seniors who would otherwise be isolated to socialize and eat a nutritious meal.

Ms. Estrada, and Ms. Neumann, was joined by Ms. Tovmasian, and Ms. Polito, CDA Data Program Specialist, to visit the Paradise Ridge Senior Center. This site is a central kitchen providing meals to Chico, Gridley and Oroville nutrition sites. The visit included a review of the kitchen, congregate meal service procedures, donation procedures, and participant interviews. This program also provides frozen meals to those participants who need meals seven days a week. The frozen meals may be produced on site or may be purchased.

A review of the ARRA Elderly Nutrition program monitoring tool was conducted with Mr. Cobery and Ms. Taylor. The A3AA plans to expend ARRA funds distributed to PSA by declaring all meals provided for the remainder of the year under ARRA expenses. Some of the Administrative costs for ARRA will be used to provide staff salary. The percentage of the staff salary will be claimed under jobs retained in the ARRA report.

Title III D Disease Prevention and Health Promotion (HPDP)

Barbara Estrada, R.D. met with Joe Cobery, Executive Director and Nancy Taylor, Aging Programs Specialist to review the HPDP monitoring tool. The HPDP program provides funds for the annual Healthy Aging Summits/Fairs and for seven Medication Management machines. A decrease in service this year was commensurate with a decrease in funding. The HPDP program that provided in-home visits to frail seniors by nursing students was eliminated.

Title III E Family Caregiver Support Program (FCSP)

Joel Weeden conducted a review of the FCSP with Susanne Rossi, Family Support Services Director, and Mary Neumann, Deputy Director, whose responsibilities include management of the I&A unit. The FCSP is delivered directly by Passages Caregiver Resource Center (CRC) and Information and Assistance (I&A) unit. Family consultants, Nancy Khanchandani and Melissa Jourdain, presented a comprehensive overview of the CRC client eligibility and client-specific performance accountability records. Kristen Chapell, CRC Administrative Assistant, readily produced expenditure supporting documentation and aggregated client profile and performance data. Ms. Taylor provided an overview of equipment utilization records. Joe Cobery, Passages Director,

and his staff remained focused on exploring ways to enhance FCSP systems and ensure consistency with OAA expectations.

Specific Programs —Older Californians Act

Health Insurance Counseling and Advocacy Program (HICAP)

Steve Miars met with Tatiana Fassieux, HICAP Program Manager, and Maria Woodbury, Volunteer Coordinator and reviewed the CDA HICAP monitoring tool. Mr. Miars completed reviewed random HICAP client intake forms, as well as HICAP Counselor records, for FY 2009/10. The client intake forms and counselor records reviewed were found to be accurate and complete. All records were readily available and Staff were courteous, knowledgeable and accommodating. Passages HICAP runs a program with excellence in serving Medicare Beneficiaries in the communities of PSA.

BEST PRACTICES OR MODELS OF SERVICE DELIVERY

Best practices or Models of Service Delivery discovered during the monitoring of AAA are being identified by CDA to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either Best Practices or Models of Service Delivery identified during the monitoring visit conducted by CDA and discussed at the Exit Conference. Best Practices or Models of Service Delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services, will be placed on CDA's website.

Title III C Elderly Nutrition Program (ENP)

A3AA has a unique affiliation with California State University Chico (CSUC). The A3AA Elderly Nutrition Program works with the CSUC Dietetic Interns to provide experience with food service and nutrition education. The interns have the opportunity to monitor kitchens and provide nutrition education for the ENPs throughout the PSA. Their work is supervised by Nancy Taylor, Aging Programs Specialist and reviewed by the Michelle Morris, R.D, CSUC Internship Director. Both parties benefit from this relationship, the interns have the opportunity to apply their education and obtain practical experience in the area of food service and the development of nutrition education materials and the AAA is provided with innovative nutrition education materials and kitchen reviews by a motivated group of individuals.

FINDINGS REQUIRING CORRECTIVE ACTION

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on January 14, 2010. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

AAA Administrative Review

Composition of Governing Board does not represent the percentage of the PSA's older minority population. [Title 22 Section 7304(12)(D)]

Corrective Action: Ensure that the composition of the Advisory Council represents the PSA's older minority population.

Data Reporting

Upon review of the AAA's data performance for timeliness and accuracy, CDA found the AAA was late with their quarterly submissions of their CARS data. Data in CARS should be complete, accurate, and consistent. [Area Plan Contract, Exhibit E]

During the monitoring visit, CDA observed that the AAA had a functional database. The AAA must review data for accuracy and submit all required reports within due dates. The AAA was successful in its initial data conversion into the GetCare system. However, several required data elements were missing from the report. To make sure all required data elements are included, the AAA needs to validate that the data was entered correctly from the subcontractors' documentation and any missing data (e.g. ADLs, IADLs, Nutritional Risk Assessments) are completed. [Area Plan Contract, Exhibit E]

Corrective Action:

- Implement a functional data reporting system.
- Submit all required and past due FY 2009/10 performance data and verify information is accurate and complete.

Upon review of the AAA's performance data, CDA found there were no data elements for the Title III E, FCSP program because the data could not be transferred from their previous system into the new database. Although data would have to be manually entered into GetCare, the AAA provided assurances that it was continuing to maintain its paper data collection system. Also, they would be able to enter the required client-detailed information and performance data by year-end. The Federal Administration on Aging (AoA) and California State Legislature require all service performance data, demographic statistics, and financial expenditures for programs and services

administered by the AAA. [AoA-PI-96-01 and AoA-PI-97-11; Welfare and Institutions Code, Section 9102; Area Plan Contract, Exhibit E]

Additionally, the AAA's written data collection/reporting procedures are not updated to incorporate the new GetCare process. Directions must clearly identify who is responsible for which tasks and their timeframes. The manual should also include a verification process to ensure data is complete, accurate and is consistent with OAA and COA regulations. [Area Plan Contract, Exhibit E]

Corrective Action: Submit all Title III E, FCSP, performance data reports to CDA on or before July 31, 2010.

Upon interviewing AAA staff, CDA found the AAA lacked a procedure for determining an estimated unduplicated count of persons served in Title III E non-registered services and a total count for both registered and non-registered clients. In FY 2008/09, the AAA had nearly a 50 percent decline in these figures while the registered number of clients remained relatively the same; thus, the numbers were underreported. Federal NAPIS-SPR requires the AAA to report a best estimated unduplicated persons served through transportation, legal assistance, nutrition education, information and referral, and outreach, plus all other services, which are supported at least in part by OAA Title III E funds. The AAA needs to report a best estimate of the total unduplicated persons served in the AAA through OAA supported programs. This estimate should take into account clients who use multiple services in both registered and non-registered services. CDA requires each AAA come up with their own logical methodology for determine these numbers. [AoA-PI-96-01 and AoA-PI-97-11, Area Plan Contract, Exhibit E]

Corrective Action: Develop and maintain a written methodology for reporting:

- Estimated unduplicated persons served in non-registered services for each service category and total for all non-registered services;
- Total estimated unduplicated persons served in both registered and non-registered services.

Upon review of the AAA's American Recovery and Reinvestment Act (ARRA) performance data, CDA found the AAA had underreported the number of clients served in comparison to the number of congregate meals supplied. The AAA also had performance data in months where there were no ARRA fiscal expenditures. The AAA must ensure the data is logical and accurate. [OMB M-09-21, OMB M-10-08]

Corrective Action

Submit corrected ARRA data reports to CDA verifying that performance data matches expenditures for each reported time period, on or before June 30, 2010.

AAA Fiscal Review

AAA nutrition contracts for Meals and Nutrition Education services did not allocate separate funding for each service. The AAA transportation contract for Transportation and Assisted Transportation services did not allocate separate funding for each service. Without service specific funding requirements it would not be possible to monitor contract expenditures for each service. When the AAA subcontracts with one provider for combined multiple services, the contract must specify an allocation for each service. [45CFR92.20 (a)1]

Corrective Action: Revise Fiscal Year (FY) 09/10 provider contracts for III C Nutrition (Meals/Nutrition Education) and contracts for III B Transportation (Assisted and Non-Assisted) to show specific allocations for each contracted service, no later than June 30, 2010.

CDA reviewed the Plumas County contract and found it did not contain a provider budget. Without service specific line-item budgeted costs it would not be possible to monitor contract expenditures for each service.

Corrective Action: Review all subcontracts to ensure they contain provider budget information.

American Recovery and Reinvestment Act (ARRA) funding was allocated to Plumas County, a AAA nutrition provider. The budget attached to the Plumas County nutrition contract did not separately identify ARRA funding.

Corrective Action: Review all subcontractor budgets to ensure they contain all appropriate funding sources. Obtain a revised budget showing, separately, all sources of funding, to be incorporated into the Plumas County ARRA/OAA Nutrition contract, no later than June 30, 2010.

CDA reviewed the AAA's expenditure reporting process and attempted to reconcile September expenditures reported to CDA with the AAA's support documents. Upon investigation CDA learned the AAA uses a performance-based payment system rather than paying providers based on actual expenditures. This creates discrepancies between costs reported and payments made to providers. Adjustments are made to provider expenditure reports to reflect the performance-based payment process; however the funding adjustments are not documented. This creates discrepancies in the amounts reported to CDA as expended. CDA was unable to verify the expenditures as reported to CDA. [45CFR92.20 (b)1] **This is a repeat finding 2006.**

Corrective Action:

- Revise current expenditure reporting systems to ensure all AAA fiscal expenditure documentation agrees with fiscal expenditure reports submitted to CDA, no later than June 30, 2010.

- Ensure expenditures submitted to CDA are based on actual costs, reporting all current costs and funding sources related to contract expenditures.

ARRA funds are currently being allocated against costs at 10 percent of the monthly reported nutrition costs. This process will guarantee unspent ARRA dollars at year end, as the allocation is not aligned with funding allocation percentages.

Corrective Action: When reporting Plumas County Nutrition costs, allocate ARRA funds using a reasonable and consistent method that will ensure allocated funding is expended by the end of the contract period.

The AAA I&A staff are unable to track actual time spent, by program. Currently, AAA staff allocate their time spent in I&A across multiple programs. However, this allocation plan has not been approved by CDA. III E staff time sheets don't reconcile with the "Utilization Log" for FCSP or the cost distribution schedule submitted for monthly reporting.

Corrective Action:

- Create a system to ensure that personnel costs are supported by actual time spent in each service category and fiscal expenditure reports reflect actual costs.
- Staff working in multiple services must track actual time spent in each direct service when reasonably possible. For staff and "Other" operating costs, where the AAA deems it infeasible to track actual time and costs, the AAA must create, and submit to CDA for review, a Direct Cost Allocation Plan that is reasonable, consistent and distributes a fair share of costs in accordance with benefits received, by June 30, 2010.
- Once accepted, implement the cost allocation plan, adjusting FY 09/10 expenditures to reflect the allocation plan.

The AAA purchased a vehicle using 100 percent of III E funds. The vehicle is not being used exclusively for III E activities. It appears there is actually a large portion of the vehicles usage that is not applicable to III E. This is allowable, however the costs of the vehicle should then be allocated amongst those programs benefiting from its usage.

Corrective Action: Create and implement a system to allocate vehicle costs based on usage (in accordance with benefits received).

The AAA does not have an inventory system in place. The AAA is in the process of converting CSU Foundation inventory records for use at the AAA.

[45CFR92.20 (b)3] **This is a repeat finding 2002, 2006.**

Corrective Action: Create and implement a property inventory system which includes performing annual physical inventories and maintaining property records

that include Description, Acquisition Date, Cost, Location, Condition, Fund Source and Manufacturer Serial #, by June 30, 2010.

Reviewing the Tehama County monitoring report file there were no working fiscal tools to support what had been reviewed. The Fiscal Officer was unable to locate the completed working Fiscal Tool. Reviewing other providers monitoring files, two substantially different fiscal tools had been completed, with two different focuses. Some monitoring tools had provider comments, however, no AAA comments were entered and there was no way to clearly identify what was reviewed and/or who actually completed the tool. [45CFR1321.11 and CDA Standard Agreement, Exhibit A, Article II]

Corrective Action:

- Revise Fiscal Monitoring Tool to include all required compliance checks for consistent application.
- Ensure actual working fiscal monitoring tool is maintained on file as documentation of the monitoring process and findings identified.

Specific Program Reports—Older Americans Act Programs

Title III B Information and Assistance (I&A)

There was no written training plan for I&A staff. [CCR, Section 7547]

Corrective Action: Develop and implement a written training plan for I&A staff that includes the required elements.

CDA staff reviewed the Passages Resource Guide and noted the required disclaimer was missing. I&A resource directories require publicly to be distributed by the AAA to contain a disclaimer statement informing the user that the directory may not be current after initial printing. [CCR, Section 7531(d)(2)]

Corrective Action: Include a disclaimer in the Passages Resource Guide that informs the reader the information may not be current after the initial printing.

Title III C Elderly Nutrition Program (ENP)

A review of the nutrition monitoring tool found that the AAA Registered Dietitian (R.D.) is not involved in: [CCR Section 7634.3]

- The development of Policy and Procedures for the ENP.
- The development of the Area Plan related to the nutrition services.
- The development of RFPs and evaluation of the proposals received related to nutrition services.
- Annual monitoring of each nutrition services provider.

Corrective Action: Ensure the AAA R.D. participates in;

- The development of a Policy and Procedure manual for the congregate and home-delivered meal programs (HDM).

- Area Plan development and update process on issues that relate to the ENP.
- The development and evaluation of the RFP concerning nutrition services.
- Annual monitoring of each nutrition services provider.

A review of the Memorandum of Understanding (MOU) between the CSU Chico Research Foundation (Passages) and the CSU Chico Department of Nutrition and Food Sciences found no requirement for the RD to review and approve the content of staff and volunteer food safety training. [CCR Section 7634.3(d)(3)]

Corrective Action: Ensure that the MOU between Passages and the CSU Chico Department of Nutrition and Food Sciences includes the requirement to approve the content of staff and volunteer food safety training.

The language in the contracts and RFP refers to Recommended Daily Allowances (RDA) rather than Dietary Reference Intakes (DRI). References to the RDAs must be replaced with DRIs. Contract and RFP language must reflect the current appropriate laws that pertain to the services provided. [CCR, Section 7638.5]

Corrective Action: Ensure the Title III C 1&2 contracts and RFP's are updated to refer to the DRI rather than the RDA.

All nutrition sites reviewed provided adequate privacy for donations. However, the donation signs did not include language clearly informing each participant that they would be served a meal regardless of whether or not they donate. [OAA, Section 315(b)(4)(B)]

Corrective Action Plan: Ensure that each service provider has clearly informed each participant that there is no obligation to contribute and that any contribution is purely voluntary. Each request for donations shall include the language that services will not be denied to any individual who does not contribute to the cost of the service.

A review of a donation request from Plumas County Senior Nutrition Program included a separate donation for the delivery of a home delivered meal and used the language, "your bill for the month." This language infers that the amount noted on the statement should be paid. [OAA, Section 315(b)(1)]

Corrective Action: Ensure that statements are not sent to HDM clients soliciting donations for meal delivery separate from the meal donation. This donation request should not refer to the calculated amount for a suggested donation as "your bill for the month."

The Colusa County Boy Scout site purchases coffee for service with the ENP meal. The ENPs may purchase coffee from a fund separate from the OAA funds for the

provision of coffee at meal sites. Coffee is not considered a food that provides any required essential nutrients and does not fulfill any part of the meal pattern requirements, as such; coffee is a non-eligible food for OAA payment. [CCR7632.3(a)(2)]

Corrective Action: Ensure that the Colusa County Boy Scout site does not purchase coffee with OAA funds.

A review of the kitchen at the Colusa County Boy Scout Site found that cold foods are stored in the refrigerator before congregate meal service. To ensure that foods will be maintained at the appropriate temperature it is essential that refrigerator and freezer logs be maintained if they are used to hold cold/frozen foods. In part states potentially hazardous food shall be maintained at or above 135°F, or at or below 41°F. [CCR 113996 (a)]

Corrective Action: Ensure refrigerator/freezer log sheets are maintained on all refrigerators and freezers to verify adequate temperatures where food is held at congregate meal sites.

A review of the ARRA monitoring tool found that the required ARRA spending plan has not been provided to CDA.

Corrective Action: Submit an ARRA spending plan to CDA that demonstrates all Nutrition Stimulus funds will be spent by June 30, 2010.

Title III E Family Caregiver Support Program (FCSP)

The 2009-12 Area Plan does not provide a rationale, for Passages current FCSP approach, to serve the two eligible populations for each of the five federal service categories. For example, the Area Plan mentions a senior/caregiver questionnaire, but not results. The FCSP unit completed a comprehensive guide of existing grandparent resources, but the information was not utilized in determining grandparent service gaps and funding priorities. The Area Plan Section 21 calls for funding in all FCSP service categories, but Grandparent Supplemental Services is not addressed in the Area Plan Service Unit Plan or Budget. [OAA 306(a), OAA 373(b), 45 CFR 1321.53, CCR 7300]

Corrective Action: Ensure the Area Plan process addresses the need for, and prioritization of, FCSP services when fulfilling the following AAA planning steps for the two FCSP eligible populations and the five federally-required support service components:

- PSA community needs assessment (including caregiver survey results, key informant feedback, demographic and performance data analyses);
- Inventory of existing resources and related service quality, availability, and geographical constraints;
- Identification of other delivery systems whose service components meet OAA requirements to the extent that Passages does not intend to budget additional Title III E funding;

- Analysis of gaps between the FCSP eligible population's assessed need and existing caregiver support resources;
- Determination of FCSP priorities within these gaps for OAA funding; and
- Proposed type and level of the prioritized services to be included the Area Plan Budget and FCSP Service Unit Plan.

In addition to printed program information materials, Passages maintains three web-based resource guides. The Passages website includes a dropdown button for Caregivers. However, the user is only provided information on Caregiver Support Groups, which is one of many components within Passages multifaceted caregiver support system. This site does not link the user to Passages Caregiver Resource Center website. This second electronic resource has not been updated to include the Caregiver Resource Center's duo role starting over three years ago as both an OAA and California Department of Mental Health provider. The third Passages electronic resource is the Network of Care. A user seeking caregiving guidance would not readily be able to access appropriate information. The site listing for FCSP does not accurately reflect Passages OAA-funded FCSP system. It also refers the user to an inoperable phone number and the Passages website (with information only on Caregiver Support Groups). FCSP is not identified as a resource in any of the Service Directory applicable topic areas, such as Caregiver Training, Respite (in all of its forms), Informal Caregivers, and Mutual Support Groups. All three web-based resource guides do not provide any information on OAA-funded FCSP services for grandparents or other older relatives caring for a child. [OAA 302(1)]

Corrective Action: Revise Passages sponsored web-based resource guides so that they facilitate access to FCSP support services.

The Passages Area Plan budgets OAA Title III E funds to support the provision of FCSP Caregiver Information and Assistance (I&A) to both FCSP-eligible family caregivers of an older adult and grandparents or other older relatives caring for a child. The I&A unit delivers this FCSP service in collaboration with OAA Title III B funded Senior I&A. The I&A data performance tracking process distinguished its performance by the type of caller – Senior (60+) or Caregiver. This process did not distinguish FCSP-eligible caregivers from all other non-senior callers, nor did it distinguish between the two FCSP-budgeted categories for FCSP-eligible family caregivers and grandparents. For example, a senior calling about a caregiving concern would be counted as a Title III B call, while a child calling about a nutrition site for their parent would be counted as a Title III E call. As a result, I&A aggregated data for budgeting and distributing costs was inconsistent with actual benefits received. This I&A data performance tracking process also categorized calls by problem codes (e.g., Grandparent Issues and Caregiving Issues) and associated time. These measures correlate with the FCSP Service Matrix and reasonable cost distribution criteria. [OAA 373(e)(1), PM 08-03 FCSP Service Matrix, OAA 373(e)(2)]

Corrective Action: Ensure I&A data performance tracking is consistent with the Department's FCSP Service Matrix and Area Plan budgeted categories.

The AAA is required to ensure that recipients of OAA-funded services are provided with an opportunity to contribute to the cost of a service. When soliciting this contribution, the client must clearly be informed “that there is no obligation to contribute and that the contribution is purely voluntary.” Passages currently budgets and reports program income-related voluntary contributions for all OAA-funded services, however, FCSP is the exception. Passages FCSP Director assured CDA that verbal requests were made during family caregiver consultations, but there were no program procedures to guide and document compliance with OAA requirements. [OAA 315(b)(4)]

Corrective Action: Ensure procedures are in place for providing FCSP recipients an opportunity to voluntarily contribute, and budget and track this program-related requirement.

AAA service providers are required to notify their clients of the AAA’s grievance process for the disposition of service delivery-related complaints. The notification may be either a general posting in visible/accessible areas or verbal/written notifications when client contact takes place within the home. [CCR 7400(a)(3)]

Corrective Action: Require OAA service providers (direct or contracted) to notify their clients of the grievance process.

CDA requires the collection of performance data and maintenance of records in order to monitor FCSP administration and compliance, and to evaluate and compare the effectiveness of OAA-supported programs. As of FY 2008/09, CDA required all AAAs to track this data through a combined client-specific and aggregate electronic data reporting system. Passages’ two service units involved in FCSP collect and document client profile, service performance, and outcomes data. However, they have not been able to get an electronic system in place that meets the criteria of, and communicate with, the web-based California Aging Reporting System (CARS). The prior paper reporting system was prematurely discontinued before resolving this issue. As a result, for the past eighteen months Passages and CDA have been unable to utilize the FCSP data to meet oversight and planning purposes. [OAA 373(e)(2)]

Corrective Action: Maintain an interim FCSP-compliant data reporting system until there is resolution of electronic systemic problems.